November 6, 2014
To the Washington Department of Ecology

These are my personal comments on the Spokane River rule.

I live in the West Central neighborhood of Spokane, and walk along the north shore of the Spokane River between the Monroe dam and TJ Meenach bridge most days of the year, usually on the Centennial Trail. I also frequently walk the river in Riverside State Park on a south-side trail between Bowl & Pitcher and Devil's Toenail.

The Spokane is an exquisitely beautiful river as it runs through the Spokane Gorge and through the state park. It is geologically unique, and much of this reach is free flowing.

My primary use and appreciation of the Spokane River is of its scenic qualities. Those qualities very much include how much water is flowing in the river. The river in the reach between Monroe dam and Nine Mile pool is exceptionally beautiful when it runs between 2,500 and 3,500 cfs. At these flows, riparian vegetation emerges at the edges and on the willow-strewn sandbars, and at the confluence of Hangman Creek. The river looks full, but not overflowing or flooding. Peering down from the Westlink pedestrian bridge at these flows we often see fish in the river. Many people are boating, especially when the weather is hot (as in July-August of 2014). Many people are fishing.

I have walked this stretch of the Spokane River for 15 years, since I moved to my home in 1999. Every year, I observe the flows drop during late summer. I often look at USGS gage information on the web, showing instantaneous flows at the Spokane gage. As the flows drop below 2500 cfs, the rocks emerge, pools are created and isolated, and fewer people are boating. Fishing, however, doesn't change much, presumably because the fish become easier to catch as they are crowded into smaller spaces — something I worry about.

I am troubled that the proposed flows for the Spokane River will not protect these many instream uses. One can observe that 850 cfs is an extremely low flow for the river, and does not look healthy.

I've included a photo of the river that I took during my walk this evening, during sunset. The flow is approximately 2100 cfs. You can see the outline of rocks along the shoreline. You can also see the wild beauty of the river, just one mile from downtown Spokane.

Beyond my concerns for the aesthetic values, I know the Spokane River is a critical ecological resource. Sandra Postel and Brian Richter have said it well in their book "Rivers for Life – Managing Water for People and Nature":

"We need and value rivers for a host of reasons – some spiritual, some aesthetic, some practical. Yet only recently has scientific understanding of what constitutes a healthy river enabled us to grasp just how critical intact rivers are to the functioning of the natural world around us. Rivers are more than conduits for water. They are complex systems that do complicated work. They include not just the water flowing in their channels, but the food webs and nutrient cycles that operate within their beds and

banks, the pools and wetlands that form on their floodplains, the sediment loads they carry, the rich deltas they form near their terminus, and even parts of the coastal or inland seas into which they empty. Along with their physical structures, river systems include countless plant and animal species that together keep them healthy and functioning."

The Spokane River provides an enormous array of social, economic and ecological benefits to our community, which the draft instream flow rule does not respect. I ask that you please study all of the values of the Spokane River for all of the people and species and processes that depend on it.

Thank you for the opportunity to provide comments.

~ Rachael Paschal Osborn 2421 W. Mission, Spokane, WA 98104

